



Ms. Marlene H. Dortch, Secretary Federal Communications Commission 9300 East Hampton Drive Capitol Heights, MD 20743

RE:

Southeastern Services, Inc.

EB Docket No. 06-36; CY2015

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the Southeastern Services, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

## /s/ Sharon R. Warren

Sharon R. Warren Consultant to Southeastern Services, Inc.

cc:

Marc Woods - Southeastern Services

file:

Southeastern Services - FCC - Other

tms:

FCx1601

Enclosures SW/mp

## ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016: Covering calendar year 2015

Name of company(s) covered by this certification: Southeastern Services, Inc.

Form 499 Filer ID: 824546

Name of signatory: Joshua Woods

Title of signatory: Vice President

- I, Joshua Woods, certify that I am an officer of the company named above, and acting as
  an agent of the company, that I have personal knowledge that the company has
  established operating procedures that are adequate to ensure compliance with the
  Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.
- Attached to this certification is an accompanying statement explaining how the
  company's procedures ensure that the company is in compliance with the requirements
  (including those mandating the adoption of CPNI procedures, training, recordkeeping,
  and supervisory review) set forth in §64.2001 et seq. of the Commission's rules.
- The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.
- The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Joshua Woods, Vice President Southeastern Services, Inc.

Date

## Statement of CPNI Procedures and Compliance For 2015 Southeastern Services, Inc.

Southeastern Services, Inc. is a small rural CLEC providing local and long distance service to business customers in one state.

We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. We have has trained our personnel not to use CPNI for marketing purposes. Should we elect to use CPNI in future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

As explained below, we have put into place processes to safeguard its customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

We do not disclose CPNI online. We currently provide and have in place well established procedures for providing call detail over the phone. All new customers are currently required to come to our office when initiating service. At this time, a photo ID is required. In the event a customer's password is lost or stolen, the customer must answer security questions which were determined at the time service was initiated and a new password is set up. No call detail will be disclosed unless the customer provides a valid password or provides the call detail information that is the subject of the inquiry without a customer service representative's assistance. If the customer does not provide a password or cannot provide the call detail information without a customer service representative's assistance, then we will only send the call detail to the customers address of record or by calling the customer at the telephone number on record.

For billing inquiries, changes to account information or to add, delete, or change services, customers are required to come into the office and present a valid photo ID.

Employees are trained and fully understand the fact that we do not allow customer information to be given out for any reason. If using a customer's personal information to maintain an account, employees are trained to properly dispose of or return the customer's information to its secured location.

We have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not experienced any breaches of CPNI to date, but will maintain records, either written or electronic, of any and all breaches discovered and notifications made to the USSS and the FBI, and to customers.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2015.

We do not have any information with respect to the processes Pretexters are using to attempt to access CPNI.